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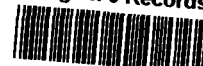
578340-038014

September 7, 2001

VIA FEDERAL EXPRESS

Rosita Clarke-Moreno (SR-6J)
U.S. Environmental Protection Agency
77 W. Jackson Blvd.
Chicago, Illinois 60604

EPA Region 5 Records Ctr.



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Larry L. Johnson, Esq. (C-14J)
U.S. Environmental Protection Agency
77 W. Jackson Blvd.
Chicago, Illinois 60604

Re: North Bronson Former Facilities Site
Operable Unit No. 3, Former Scott Fetzer Facility

Dear Ms. Clarke-Moreno and Mr. Johnson:

I am writing with respect to the Special Notice of Liability dated July 5, 2001 sent to me as legal representative of The Scott Fetzer Company ("Scott Fetzer") regarding Operable Unit No. 3 ("OU3") of the North Bronson Former Facilities Site in Bronson, Michigan ("the Site"). I am authorized by Scott Fetzer to submit this good faith offer on its behalf.

As evidence of its good faith offer, Scott Fetzer submits the following:

Willingness to Conduct the RI/FS

As you know, representatives of Scott Fetzer have already met with Ms. Clarke-Moreno to present Scott Fetzer's preliminary approach for conducting a remedial investigation at OU3. Since that meeting, Haley & Aldrich, Scott Fetzer's technical consultant for this matter, has prepared a proposed work plan describing in greater detail investigative activities to be undertaken at the OU3. Scott Fetzer is committed to negotiating in good faith with the Agency a consent order and associated documents that are consistent with the approach previously presented to the Agency.

Revisions to the Consent Order

Submitted herewith as Exhibit A is a marked-up version of the draft consent order that accompanied the Special Notice reflecting changes which are necessary. For your convenience,

CL-616531v1

Rosita Clarke-Moreno (SR-6J)
Larry L. Johnson, Esq. (C-14J)
September 7, 2001
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I am also enclosing a computer diskette which contains as WordPerfect files the marked-up and clean versions of this revised consent order. Scott Fetzer has coordinated with the other PRPs for OU1 and OU2 of this Site in order to present revised drafts that are as similar as possible under the circumstances. Major changes to the consent decree focus on limiting Scott Fetzer's obligations to that portion of the Site which constitutes OU3. Scott Fetzer is prepared to discuss these proposed changes with the Agency and, to the extent appropriate, the other PRPs on a schedule allowing resolution of any issues within the moratorium period provided for under CERCLA.

Revisions to the Statement of Work

Submitted herewith as Exhibit B is a marked-up version of the draft statement of work that accompanied the Special Notice reflecting changes which are necessary. Files with the marked-up and clean versions of the revised statement of work are contained on the enclosed diskette. The changes to the draft statement of work primarily reflect the phased approach for additional investigation which has been discussed with the Agency. Included in the package being sent to Ms. Clarke-Moreno is a proposed Support Sampling Work Plan and associated documents which is consistent with the work plan requirements of the revised statement of work. Scott Fetzer believes that it would be more productive to focus the parties' attentions on the work plan rather than the scope of work in an attempt to reach consensus on the work plan, as the primary operative document, prior to entry of the consent order. Scott Fetzer is prepared to discuss these documents at the Agency's earliest convenience.

Technical Capability

Prior to and throughout the Special Notice process, Scott Fetzer has been assisted by Haley & Aldrich, a national environmental consulting firm which is familiar with and has participated in all aspects of the CERCLA process. As reflected in the proposed work plan submitted herewith, Scott Fetzer intends to designate Rob Wilhelm of Haley & Aldrich as its Project Coordinator for this matter.

Reimbursement of Agency Costs

Scott Fetzer recognizes that reimbursement of government response costs is an important component of the CERCLA enforcement scheme. Accordingly, Scott Fetzer is willing to include cost recovery issues within our discussions as we work together to reach agreement on the terms of an acceptable consent order. In particular, to the extent that any past costs attributable to the Site relate not only to OU3 but also to OU1 and OU2, it will be necessary to allocate those costs as appropriate among the respective PRPs.

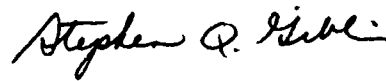
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Identification of Representative

I will continue to serve as Scott Fetzer's representative, for purposes of negotiation with respect to OU3.

Scott Fetzer trusts that this good faith offer satisfies the Agency's need for an indication that further negotiations regarding the Site are needed and would be productive. Once you have had an opportunity to review this good faith offer, please contact me so that we can discuss how best to proceed.

Very truly yours,

A handwritten signature in black ink, reading "Stephen Q. Giblin". The signature is written in a cursive, flowing style.

Stephen Q. Giblin

Enclosures

cc: Patricia M. Scanlon, Esq. (w/encl.)
Robert W. Wilhelm II (w/encl.)
Susan M. Franzetti (w/encl.)
David L. Tripp (w/encl.)